



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397  
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

(217) 557-8155

(FAX) 782-3258

March 12, 2008

Engineering Field Activity, Midwest  
Attn: Mr. Howard Hickey  
Building 1A, Code 931  
201 Decatur Avenue  
Great Lakes, Illinois 60088-5600

Re: Final Preliminary Assessment  
NTC Lakefront and TSA Ranges  
Naval Station Great Lakes  
Great Lakes, Illinois

0971255048 - Lake  
Great Lakes Naval Station  
Superfund/Technical

Dear Mr. Hickey:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the *Final Preliminary Assessment, Naval Station Great Lakes, Illinois for the NTC Lakefront and TSA Ranges*. It was drafted by Malcolm Pirnie, Inc. on behalf of the Naval Facilities Engineering Command (Navy) Midwest. It was dated February 2008 and was received on March 3, 2008. Included with the Final document were the Malcolm Pirnie Responses to Comments on the Draft document which were submitted by Illinois EPA. The Agency has reviewed the responses to comments and the final document and is providing the following additional comments.

- 1) **Section 1.0** – It states in the last paragraph that 2 compact disks are included with this report. They were not included in the package that arrived at the Agency. Please provide those disks so that our files will be complete and their content can be reviewed.
- 2) **Response to Comment Number 2, Section 2.3** – The initial comment requested an explanation for why certain sites were not included in the Preliminary Assessment (PA). The response states that the majority of the sites were ineligible for inclusion in the Navy Munitions Response Program. The report was revised to expand on that determination. In Section 2.3, 11 sites are determined to be ineligible based upon the fact that those sites were used for storage of munitions only; munitions firing did not occur at those sites. Illinois EPA has reviewed the Munitions Response Site Prioritization Protocol Primer (April 2007) issued by the Office of the Deputy Under Secretary of Defense (Installations and Environment) Office of Environmental Management and cannot find where storage sites are determined to be ineligible. There is a section titled “Locations Where the Protocol Will Be Applied” that identifies sites “known or suspected to contain UXO,

ROCKFORD -- 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000  
ELGIN -- 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463  
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800  
SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120  
MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

DMM, or MC”, which the Agency believes would include storage sites. (Illinois EPA has found through previous investigations that munitions are sometimes disposed (DMM) and munitions constituents (MC) are sometimes found within and/or in the soil surrounding or very near storage magazines. Information on such past practices would satisfy the “suspected” portion of that requirement.) The Primer also identifies sites that are to be excluded from investigation. Storage sites are not on that list. Therefore, Illinois EPA does not agree with the Navy determination that storage sites are ineligible for inclusion in the Munitions Response Program.

- 3) **Sections 5.1.1.5 and 5.2.1.5** – The Memorandum of Agreement mentioned in these sections were never signed by the United States Environmental Protection Agency. Therefore, they should not be referenced in relation to it.
- 4) **Table 5.1-1** – Under findings for munitions types, the 3-inch, .50 caliber artillery, listed in Section 5.1.3, was left out. It should be listed here as well.
- 5) **Section 5.1.12** – The first paragraph lists the munitions utilized at the range, but as before, the 3-inch, .50 caliber artillery was left out. It should be listed here.
- 6) **Appendix B** – In response to Agency comments, the interview with Mr. Mark Schultz was included in Section 4.2. However, there is no Interview Record provided. If Mr. Schultz was interviewed, there should be an Interview Record included in this appendix.

Given that there are still a few outstanding issues with this submittal, Illinois EPA cannot concur with the Navy’s Preliminary Assessment at this time. Such a determination will be made once these comments have been properly addressed.

If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or by electronic mail at [Brian.Conrath@illinois.gov](mailto:Brian.Conrath@illinois.gov).

Sincerely,

*Brian A. Conrath*

Brian A. Conrath  
Remedial Project Manager  
Federal Facilities Unit  
Federal Site Remediation Section  
Bureau of Land

BAC:prf H:\GLNTC\FPAMMRP\vw

cc: Owen Thompson, USEPA (SR-6J)